

30(b)(6) Paul Varghese Cont'd
Provence, Tiffany N v. United States of America, et al

March 9, 2022

Page 1

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

TIFFANY N. PROVENCE, AS THE PERSONAL REPRESENTATIVE OF THE ESTATE OF JUAN ANTONIO VILLALOBOS HERNANDEZ,

Plaintiff,

vs. CASE NO. 2:21-cv-965-RMG

UNITED STATES OF AMERICA,
CROWLEY MARITIME CORPORATION,
CROWLEY GOVERNMENT SERVICES,
INC., DETYENS SHIPYARDS, INC.
AND HIGHTRAK STAFFING, INC.
D/B/A HIGHTRAK STAFFING, INC.,
Defendants.

VTC

30(b)(6)
(CONTINUED)

DEPOSITION OF: CROWLEY GOVERNMENT
SERVICES BY PAUL VARGHESE

DATE: March 9, 2022

TIME: 10:44 AM

LOCATION: Hines & Gilsonan, LLC
1535 Hobby Street, Suite 100
Charleston Navy Yard
North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: Priscilla Nay,
Court Reporter
(Remotely via VTC)

Page 152

1 about the systems like you just explained it,
2 right?

3 MR. GILSENAN: Objection.

4 THE WITNESS: He did not know anything
5 about the rigging.

6 BY MR. YOUNG:

7 Q. Okay.

8 A. He knew it was a system operation.

9 Q. Okay. Yes. Good. And it's also true
10 that between November of 2018 and August 3rd of
11 2019 nobody from Crowley observed any hazardous
12 condition related to the lifeboats or the lifeboat
13 davits on the Lummus. Is that accurate?

14 A. Crowley has not -- Crowley reps have
15 not identified a visible in the sense there were
16 six lifeboats rigged almost the same way. So there
17 was nothing triggering them to see that one isn't
18 the -- one is a hazard and the others are not.

19 So basically what the -- the rigging
20 experts of the Detyens did was thought to be the
21 correct way to do it.

22 Q. But you know today that that was not
23 the correct way, right?

24 A. I do not -- I cannot answer that one
25 because I have not seen that one or I have not

Page 153

1 inspected and then until we -- we know exactly what
2 was the root cause of that failure -- because there
3 were six davits were restrained the same way.

4 One failed. Five did not. That means
5 there could be other reasons, you know, like
6 electrical current going through some -- some
7 source or, you know, they didn't use the same --
8 same wire. You know, same method to that.

9 We don't know. That is why there was
10 nothing visible because all six were, you know,
11 rigged there and then, you know, that is why it
12 didn't trigger him to take number -- Number 5
13 for -- for a particular action.

14 Q. Okay. So you believe that all six of
15 these lifeboat davits systems were -- excuse me --
16 were rigged properly and safely. Is that your
17 testimony?

18 A. It's for Detyens to answer that because
19 we contracted that through Detyens and then we --
20 under their safety management system we assumed
21 that they did that correctly or if not, you know,
22 they -- they need to answer to that.

23 Q. All right. You've seen the OSHA
24 violations. Those don't affect your testimony in
25 any way. Is that right?